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December 13, 2021

BY ECF

Hon. Analisa Torres  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: *Bautista et al. v. Countywide Masonry Corp. et al* 19-cv-8808 (AT)**

Your Honor:

This office represents Plaintiffs in the above-referenced matter. We write jointly with attorneys for Defendants to respectfully request an extension of discovery in this case. This is the second request of this kind.

The reasons for this request are 1) Carben Defendants are working to respond to Plaintiffs' initial discovery requests and 2) the parties have had continuing scheduling conflicts when attempting to schedule depositions. There are nine individual plaintiffs in this case as well as two sets of Defendants with separate counsel.

The depositions for three of the nine plaintiffs have been scheduled for the week of December 20, 2021. Due to scheduling conflicts, it is anticipated the depositions for the remaining plaintiffs and defendants will not be able to be completed until after the New Year. The parties thus respectfully request a sixty-day extension of fact discovery.

GRANTED. By **February 14, 2022**, the parties shall complete fact discovery. The case management conference scheduled for January 4, 2022, is ADJOURNED to **March 8, 2022**, at **10:00 a.m.** By **March 1, 2022**, the parties shall submit their joint status letter.

SO ORDERED.

Dated: December 14, 2021  
New York, New York



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**ANALISA TORRES**  
United States District Judge